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Telephone (610) 660-9955

Attorney for Plaintiff

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

|                                |   |                  |
|--------------------------------|---|------------------|
| LAURIE E. SWEIGARD             | : |                  |
| Plaintiff                      | : | CIVIL ACTION NO. |
|                                | : | 02-2755          |
| V.                             | : |                  |
|                                | : |                  |
| CHOICE SERVICES INTERNATIONAL, | : |                  |
| INC., ET AL                    | : |                  |
| Defendants                     | : |                  |

MOTION FOR EXTENSION OF TIME  
FOR DISCOVERY AND RELATED DEADLINES

1. Plaintiff filed her Complaint herein on May 8, 2002.
2. Defendants' Answer was filed on or about May 30, 2002.
3. The Plaintiff served her discovery requests on Defendants or about June 20, 2002.
4. Defendants' served their discovery requests on Plaintiff on or about June 28, 2002.
5. Plaintiff's responses to Defendants' discovery requests were served on or about July 25, 2002.
6. On September 6, 2002, Plaintiff filed a Motion to Compel Answers to Interrogatories and Production of Documents, and said motion was granted on September 10, 2002.

7. On September 9, 2002, Plaintiff received Defendants' objections and partial responses to her interrogatories and document requests.
8. Thereafter the Defendants have provided some additional documents and responses, and have agreed to search for and provide additional documents.
9. On September 26, 2002, the Plaintiff filed a Second Motion to Compel Production of Documents and for Attorneys Fees and Costs concerning certain disputed documents being withheld by Defendants under a claim of privilege. On October 3, 2002, Defendants reconsidered their position and produced the remaining documents that were the subject of Plaintiff's Second Motion to Compel. Said Motion remains outstanding as to the issue of attorneys fees and costs.
10. The Defendants are continuing to produce certain other documents, and have agreed to continue to cooperate with Plaintiff's requests. (Exhibits A and B).
11. Despite the aforementioned discovery disputes and the resultant delays, the parties have taken six (6) depositions, and three additional depositions are currently scheduled.
12. Plaintiff just received discovery responses concerning the benefits provided to certain classes of employees of Defendants for purposes of preparing an expert report on economic losses. Certain wage data was provided on

September 23, 2002, and Defendants agreed to provide supplemental information on benefits.

13. Plaintiff is now in the process of forwarding this information to her economic expert for analysis and the preparation of a report. It is anticipated that additional time will be required to prepare this report.
14. Plaintiff also requires additional time to receive and review the documents still being produced by Defendants and determine whether or not additional depositions are warranted.
15. Based upon information learned in discovery, Plaintiff has served a supplemental request for production of documents, and the response to said request is not yet due.
16. The Plaintiff's efforts to promptly prepare this matter for trial have been hampered by the delay in receiving responses to discovery requests. Additional delay resulted from Plaintiff's preparation for trial in a case before Judge Clarence C. Newcomer of this Court in September 2002.
17. As a result of the foregoing, the Plaintiff requires an extension of the discovery deadline and the related deadlines set forth in this Court's scheduling order dated July 9, 2002.
18. Plaintiff's counsel hereby certifies that this motion is uncontested.

WHEREFORE, the Plaintiff respectfully requests this

Honorable Court to grant her Motion, and extend by forty-five (45) days the discovery deadline and related deadlines set forth in the Scheduling Order dated July 9, 2002.

Date: October 7, 2002

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JOSEPH A. HIRSCH, ESQ.  
Attorney for Plaintiff

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| V.                             | : |                  |
|                                | : |                  |
| CHOICE SERVICES INTERNATIONAL, | : |                  |
| INC., ET AL                    | : |                  |
| Defendants                     | : |                  |

**Certificate of Service**

I, Joseph A. Hirsch, Esq., hereby certify that on this date, I served a true and correct copy of the Plaintiff's Motion for Extension of Time for Discovery and Related Deadlines upon Peter D. Bludman, Esq., counsel for Defendants, at Margolis Edelstein, The Curtis Center, 4<sup>th</sup> Floor, Independence Square West, Philadelphia, PA 19106-3304, via first fax (215-922-1772) and first class mail, postage prepaid.

Date:

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| Defendants                     | : |                  |

O R D E R

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2002,  
upon consideration of the Plaintiff's Motion for Extension of  
Time for Discovery and Related Deadlines, and it appearing that  
said Motion is not opposed, it is hereby ORDERED that the  
Plaintiff's motion is GRANTED, and the deadlines set forth in  
this Court's order dated July 9, 2002 are hereby extended by  
forty-five (45) days.

BY THE COURT

\_\_\_\_\_  
, J.

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| Defendants                     | : |                  |

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(b)

I, Joseph A. Hirsch, Esq., hereby certify that the foregoing  
Motion for Extension of Time is uncontested.

Date:

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JOSEPH A. HIRSCH, ESQUIRE